

Darcy M. Crum  
Rebeck & Crum  
An Association for The Practice of Law  
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P. O. Box 2720  
Great Falls, Montana 59403-2720  
(406) 727-8400  
State Bar I.D. Number 2886  
Trustee

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MONTANA

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In re: )  
WILLIAM D. MOONEY and ) Case No. 13-60870-7  
MARLO R. HEALY-MOONEY, )  
 )  
Debtors. )  
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**TRUSTEE'S MOTION FOR TURNOVER**

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Darcy M. Crum, Chapter 7 Trustee, moves the Court to require the debtor to turnover to the Trustee with five days of the date of the order sustaining this motion to turnover the following:

1. An accounting of the accounts receivable pending on June 24, 2013, the date the bankruptcy petition was filed; and
2. An accounting of the accounts receivable paid post-petition including the amount received for each account.

Trustee requested this information at the July 29, 2013 §341 meeting of creditors and again on September 17, 2013. As of this date Trustee has not received the requested information.

DATED this 18<sup>th</sup> day of December, 2013.

By: /s/ Darcy M. Crum  
Darcy M. Crum, Trustee

**NOTICE:**

**If you object to the motion, you must file a written responsive pleading and request a hearing within fourteen (14) days of the date of the motion. The responding party shall schedule the hearing on the motion at least 21 days after the date of the response and request for hearing and shall include in the caption of the responsive pleading in bold and conspicuous print the date, time and location of the hearing by inserting in the caption the following:**

**NOTICE OF HEARING**

**Date:** \_\_\_\_\_

**Time:** \_\_\_\_\_

**Location:** \_\_\_\_\_

**If no objections are timely filed, the Court may grant the relief requested as a failure to respond by any entity shall be deemed an admission that the relief requested should be granted.**

By /s/ Darcy M. Crum \_\_\_\_\_  
Darcy M. Crum

**DECLARATION OF ELECTRONIC SERVICE**

The undersigned certifies, under penalty of perjury, that on December 18, 2013, the following parties received electronic notification from the Bankruptcy Court's ECF system and do not require mailed copies: Gary S. Deschenes, Office of the United States Trustee. A copy of the motion was sent to the debtors at their addresses as follows:

MARLO R. HEALY-MOONEY  
1311 3RD AVE NW  
GREAT FALLS, MT 59404-2151

WILLIAM D. MOONEY  
136 SUN LOOP LANE  
GREAT FALLS, MT 59404-6231

/s/ Darcy M. Crum  
Darcy M. Crum  
Trustee